

BAKER BOTTS LLP

30 ROCKEFELLER PLAZA
NEW YORK, NEW YORK
10112-4498

TEL +1 212.408.2500
FAX +1 212.408.2501
BakerBotts.com

AUSTIN
BRUSSELS
DALLAS
DUBAI
HOUSTON
LONDON

NEW YORK
PALO ALTO
RIYADH
SAN FRANCISCO
SINGAPORE
WASHINGTON

January 18, 2024

Brendan F. Quigley
TEL: 2124082520
FAX: 2122592520
brendan.quigley@bakerbotts.com

The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Yanping Wang, et al.*, 23 Cr. 118-3 (AT)

Dear Judge Torres:

We represent Yanping Wang in this matter. We write in response to the Court's January 16, 2024 order directing us to inform the Court by today whether, in light of the new schedule in the case, Ms. Wang "intends to file a new omnibus motion, or whether [Ms. Wang] intends to rest on the arguments contained in her motion dated December 15, 2023." ECF No. 230.

Ms. Wang does not intend to file additional motions to suppress, for a bill of particulars, or for severance in light of the S2 Indictment. As such, and as we have discussed with the government, these motions will continue to be briefed on the schedule entered by the Court on November 15, ECF No. 175, with the government's opposition due today and Ms. Wang's reply due February 1.

Ms. Wang did join in portions Mr. Kwok's motion to dismiss the S1 Indictment, which the Court has now dismissed as moot. *See* ECF No. 230 ¶ 1. For avoidance of doubt, and while reserving all rights, Ms. Wang will file any motion to dismiss all or part of the S2 Indictment on the schedule in paragraph 1 of the Court's January 16 Order. *See id.*

Respectfully submitted,

/s/ Brendan F. Quigley
Brendan F. Quigley